UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In re: : Case No. 18-11052 TPA

William R. Adams : Chapter 13

Debtor :

William R. Adams :

Movant :

vs. : Document No.

Ronda J. Winnecour, Esquire : Chapter 13 Trustee :

Respondent :

NOTICE OF CONVERSION TO CHAPTER 7

The debtor, William R. Adams, by his undersigned counsel, respectfully represents the following:

- 1. The debtor commenced this case on October 12, 2018 by filing a voluntary petition under Chapter 13 of the Bankruptcy Code.
- 2. This case has not previously been converted to another chapter.
- 3. The debtor hereby gives Notice that he is converting his case to a case under Chapter 7 of the Bankruptcy Code.
- 4. The debtor was unable to sell his house and ended up surrendering the house through the Chapter 13. The debtor's car is no longer working so he will be surrendering the vehicle through the Chapter 7 and paying debtor's mother for use of a vehicle.
- 5. There is a change in circumstances. Debtor has his son full-time and does not receive support from mother. Debtor is now a two-person household and his expenses have increased such that he can no longer afford to pay unsecured creditors.

WHEREFORE, the debtors requests that your Honorable Court enter an order converting this case to a Chapter 7 bankruptcy case.

Date: April 23, 2021 /s/ Rebeka Seelinger____

Rebeka Seelinger, Esq. PA I.D. 93897 Seelinger Law Corporation 4640 Wolf Rd Erie, PA 16505 (814)-824-6670 rebeka@seelingerlaw.com Counsel for Debtor